



**APPLICATION
FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY
AND PUBLIC NEED**

MARCH 25, 2002

Iroquois Extension and the use of this area for shellfishing may be precluded until the site conditions and shellfish communities are restored. Only three other lease beds are within 1,000 feet of the proposed centerline (see Table 2, Figure 8, and Exhibit 2). Other than insignificant impacts associated with temporary increases in turbidity, these three other shellfish lease beds will not be directly impacted due to their distance from the proposed pipeline route.

Iroquois will meet with the operator(s) of the shellfish lease area crossed as well as those shellfish areas within one mile 1,000 feet of the pipeline centerline to discuss means in which to avoid and minimize potential impacts to the submerged lands where these lease areas occur. Iroquois will coordinate with all leaseholders regarding the development of construction plans, timing of construction, and construction methods that will be employed to cross these areas. Harvesting shellfish within the construction corridor before the commencement of construction activities would be a means to temporarily mitigate for the use of these shellfish areas. Because shellfish hibernate and are non-reproductive during the winter months, construction during this period may also reduce the potential impacts of suspended sediments to shellfish in the lease areas in the vicinity of the proposed tie-in and pipeline.

Suspended sediments from dredging activities may lower overall water quality on a temporary basis, which would interfere with the spatting season of many shellfish species if conducted during reproductive periods. The potential impacts to shellfish lease areas are expected to be minimal and short-term. It is expected that construction will proceed quickly through the lease area, and that potential turbidity related to excavating the tie-in location and plowing the pipeline will be minor and will quickly resettle.

Iroquois's operation of the Iroquois Extension is also expected to have a minimal impact on the lease bed in which the tie-in is located. Once every 7 to 10 years, Iroquois will access the domed cover over the tie-in location to conduct operational in-line inspection (pigging) of the pipeline for maintenance purposes. This inspection will require approximately one week to complete and is expected to impact only the 0.13 acres directly over the tie-in location.

Iroquois has proposed to implement the following mitigation measures to minimize potential impacts to shellfish areas:

- Construct the pipeline through all leased shellfish areas in the winter months, using plowing wherever feasible;
- Notify all parties of interest of the exact location of the proposed pipeline alignment and construction corridor prior to construction;
- Coordinate and communicate with all interested parties on the timing and scheduling of construction activities;
- Evaluate potential construction methods to help avoid and minimize disruption to shellfish harvesting and reproduction; and
- Conduct sediment deposition studies to define potential areas of impact.

Along with the implementation of these mitigation measures, Iroquois has proposed to consult with the State of Connecticut Department of Agriculture, Bureau of Aquaculture, representatives of the Connecticut Lobsterman's Associations, and any individual shellfish leaseholder along the proposed pipeline route regarding means in which to avoid or minimize impacts on these areas.

3.3.6 Lobstering

In order to minimize potential impacts to the lobster industry from the construction and operation of the proposed pipeline, Iroquois, in much the same manner as with shellfish leases, will consult with the Connecticut Lobsterman's Association to develop and implement measures to avoid and/or mitigate any negative impacts. Iroquois proposes to include the following mitigation measures in order to minimize impacts on the lobster industry within the Long Island Sound:

- Construct the pipeline during the winter months, using plowing wherever feasible;
- Notify the Lobsterman's Association of the exact location of the proposed pipeline alignment and construction corridor prior to construction;
- Advise the Lobsterman's Association of the size of the lay barge and support vessels within the construction spread;
- Advise the Lobsterman's Association of the construction schedules and to update scheduling changes to facilitate the removal of lobster pots within the construction corridor prior to construction; and,
- Investigate whether a lobsterman should act as a spotter on the lay barge during construction to identify and remove fishing gear within the construction work area.

3.3.7 Recreational Fishing

Impact on recreational fishing activities within the Long Island Sound is expected to be short-term and minor. Construction is scheduled to occur in the winter months, at which time charter boats are typically not active. Some temporary loss of recreational fishing areas is